

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA

AARON B. STALEY and his wife,)
TANESIA STALEY,)
)
Plaintiffs)
)
vs.) No. 1:21-cv-00187-CHS (lead)
)
WACKER POLYSILICON NORTH)
AMERICA, LLC, a Tennessee limited)
liability company,)
)
Defendant)

MOISES SANCHEZ,)
)
Plaintiff)
)
vs.) No. 1:21-cv-00188-CHS
)
WACKER POLYSILICON NORTH)
AMERICA, LLC, a Tennessee limited)
liability company,)
)
Defendant)

PLAINTIFFS' NOTICE OF SERVICE OF DISCOVERY

Pursuant to Rules 26, 33 and 34 of the *Federal Rules of Civil Procedure*, Plaintiffs hereby file notice of serving the following discovery documents:

1. Plaintiff's Responses to Wacker Polysilicon North America, LLC's First Set of Requests for Admission to Aaron B. STaley;
2. Plaintiff, Aaron B. Staley's Answers to Wacker Polysilicon North America, LLC's First Set of Interrogatories;

3. Plaintiff, Aaron B. Staley's Responses to Wacker Polysilicon North America, LLC's First Set of Requests for Production;
4. Plaintiff, Tanesia Staley's Ansewrs to Wacker Polysilicon North America, LLC's First Set of Interrogatories; and
5. Plaintiff, Tanesia Staley's Responses to Wacker Polysilicon North America, LLC's First Set of Requests for Production.

Respectfully submitted,

McMAHAN LAW FIRM

s/James R. Kennamer

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and exact copy of this pleading has been served upon the defendant or counsel for all parties at interest in this case, to wit:

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by delivering a true and exact copy of said pleading to the office of said counsel or by placing a true and exact copy of said pleading in the United States Mail addressed to the defendant(s) or to said counsel at his/her office, with sufficient postage thereupon to carry the same to its destination.

This 13th day of January, 2022.

s/James R. Kennamer, BPR #16172